EX PARTE OR LATE FILED

PR 93-61

HOFSTRA UNIVERSITY

COPY ORIGINAL

RECEIVED

JAN 12 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

The Hon. Reed Hundt
Chairman
Federal Communications Commission
1919 H Street NW
Washington, DC 20554

November 29, 1994

Dear Chairman Hundt:

I have just become aware of the Federal Communications Commission proceeding to expand proposed rules for location and monitoring services (LMS). I am writing to make sure that the FCC is aware of the potential negative effects that these rules may have on consumers with disabilities. LMS services would have a higher priority in the 902-928 Mhz spectrum range than Part 15 unlicensed devices, and would potentially interfere with new technology that would benefit people with disabilities.

A simple example is the cordless telephone which is a convenience for people who are "able-bodied". For many people with mobility limitations, they have become a necessity -- because they cannot quickly run to a ringing telephone. Some friends of mine keep a cordless phone on their wheelchairs, making it both convenient and easy to answer a ringing phone. The next generation of these cordless telephones that are digital will most probably operate in the 902-928 Mhz spectrum. Hence my concern over interference from LMS with future technologies of vital importance to Americans with disabilities.

Digital cordless telephones and other new digitized devices will take on increasing importance for Americans with disabilities in the years to come. Cordless telephones of the future may have two-way interactive video screens so that a deaf person could use sign language to communicate over the phone, or the phone may have a text print-out. For people with speech limitations, digitized phones may offer synthesized speech, giving them a clearly understandable "voice". To the extent that the new location and monitoring services are allowed to operate in this spectrum and create interference with these Part 15 devices, much-needed assistive technology products may be rendered inoperable or even useless.

Were the Commission to decide to expand the use of this spectrum by LMS, it would discourage development of newer such devices and services, further harming Americans with disabilities. I believe this to be a key consideration. An FCC decision according

No. of Copies rec'd 0
List ABCDE

automatic vehicle monitoring (AVM) and/or LMS services greater use of the 902-928 Mhz spectrum would signal to the market that new digitized products and services would become increasingly unreliable, due to growing interference. Such a decision by the FCC would dampen investment in new and innovative wireless technologies.

My long-standing involvement in public policy issues connected with disability and technology makes me sensitive to these issues. Since 1976, I have worked closely with the US Congress Office of Technology Assessment, the US House of Representatives Committee on Science and Technology, and other legislative bodies, as well as the executive branch (National Institutes of Health, National Science Foundation, National Institute on Disability and Rehabilitation Research, and Architectural and Transportation Barriers Compliance Board, for which I was director of research 1984-1987). I am author of Personal Computers and Special Needs (Sybex Computer Books, 1984) and numerous other books and articles on technology as it affects people with disabilities and senior citizens.

This work makes me acutely aware of the potentially far-reaching effects of the decisions the FCC soon will make on Part 15. It also sensitizes me to the necessity for intelligent compromise. I would hope that the FCC would balance the need to maintain the integrity of unlicensed spectrum -- so that current products will work without interference and so that industry will continue to research future devices -- while at the same time supporting AVM and LMS services. One such compromise might be encourage developing AVM and LMS services to find creative ways to avoid interference with unlicensed wireless devices.

I would ask that the FCC, in its deliberations, consider these and any other consumer concerns.

Sincerely yours,

Frank G. Bowe, Ph.D.
Professor